

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Jeffrey A. Brennan and Margaret J. Brennan
Debtors

Carrington Mortgage Services, LLC as
servicer for Bank of America, N.A.,
Movant,
v.

Jeffrey A. Brennan and Margaret J. Brennan,
Respondents/Debtors,

William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
18-15996/ELF

**AMENDED OBJECTION OF CARRINGTON MORTGAGE SERVICES, LLC AS
SERVICER FOR BANK OF AMERICA, N.A. TO CONFIRMATION OF DEBTORS'
CHAPTER 13 PLAN OF REORGANIZATION**

Carrington Mortgage Services, LLC as servicer for Bank of America, N.A., by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtors' Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about September 10, 2018, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtors' principal residence located at 109 East Manoa Road, Havertown, PA 19083.
3. Movant filed its Proof of Claim on or about November 19, 2018 citing arrears in the amount of \$27,791.38, and a total claim of \$158,264.42.
4. Debtors' proposed plan calls for the payment to Movant of arrearages in the amount of \$17,551.90 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.

7. The Court must deny confirmation of Debtors' Chapter 13 Plan.

WHEREFORE, Carrington Mortgage Services, LLC as servicer for Bank of America, N.A. respectfully requests that confirmation of the Debtors' Plan be denied, that Debtors' bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: November 20, 2018

BY: _____

Kristen D. Little, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610)278-6800/ fax (847) 954-4809
PA BAR ID #79992
klittle@logs.com
pabk@logs.com

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